

## **REMARKS**

Applicant respectfully requests reconsideration. In response to the Office Action, the following remarks are presented and amendments have been made in the claims. No new matter has been added.

### **I. Amendment to the Specification**

The specification has been amended to correct a translation error, as provided in MPEP 201.13. The amendment is fully supported by the Japanese application (JP 2004-238786) that is incorporated by reference into the present application and to which the present application claims priority. A machine translation of the description of JP 2004-238786 is attached hereto. Support for the amended subject matter appears at paragraph [0031] of the translation.

### **II. Rejections Under 35 U.S.C. §103**

The Office Action rejects claims 1 and 2 (including independent 1) under 35 U.S.C. 103(a) as allegedly being obvious over Hong et al. (U.S. Publication No. 2005/0007516), in view of Yu et al. (U.S. Publication No. 2004/0223313), Taniguchi et al. (U.S. Publication No. 2003/0086030), and Kashima et al. (U.S. Patent No. 5,093,765). Claims 3 and 4 (including independent 3) are rejected under 35 U.S.C. 103(a) as allegedly being obvious over Hong et al., Yu et al., Taniguchi et al., Kashima et al., and Hooker et al. (U.S. Patent No. 5,477,422). Claims 5-9 (including independent 9) are rejected under 35 U.S.C. 103(a) as allegedly being obvious over Yu et al., in view of Taniguchi et al., and Kashima et al. While Applicant does not agree with the basis for the rejections, amendments have been made in the claims to advance the prosecution of the application.

#### **a. Independent Claim 1**

Independent claim 1 recites a backlight device comprising: a light diffusion plate disposed between a transmission type display panel and a light source unit in which plural light source

blocks, where a large number of light emitting diodes are mounted, are arranged with a predetermined spacing therebetween, and adapted to allow a portion of rays of display light which have been emitted from respective light emitting diodes to be transmitted therethrough, and to allow the other portion thereof to be reflected thereon to deliver the rays of display light thus obtained to the transmission type display panel in a uniform state from an entire surface thereof, wherein the light diffusion plate is formed by resin material having light transmission characteristics, and is adapted so that light adjustment patterns are formed within respective regions facing respective light emitting diodes of plane surfaces opposite to the light source blocks to reflect the rays of display light, *the light adjustment patterns being formed by attaching light reflection ink, wherein the light reflection ink comprises a light reflection ink material comprising a light shielding agent and a diffusion agent*, and wherein the respective light adjustment patterns are formed to correspond to respective light emitting diodes, each of the respective light emitting diodes having a diameter  $D$ , and *wherein a first length  $W_1$  corresponding to the major axis of each of the respective light adjustment patterns is 1 mm to 2 mm larger than  $D$ , and wherein a second length  $W_2$  of each of the respective light adjustment patterns, the second length  $W_2$  corresponding to a second axis perpendicular to the first axis, is 2 mm to 4 mm larger than  $W_1$ .*

First, the references do not disclose or suggest respective light adjustment patterns formed to correspond to respective light emitting diodes, each of the respective light emitting diodes having a diameter  $D$ , “wherein a first length  $W_1$  corresponding to the major axis of each of the respective light adjustment patterns is 1 mm to 2 mm larger than  $D$ , and wherein a second length  $W_2$  of each of the respective light adjustment patterns, the second length  $W_2$  corresponding to a second axis perpendicular to the first axis, is 2 mm to 4 mm larger than  $W_1$ .” The Examiner states that Taniguchi [paragraph 0062] discloses “an elliptically shaped dot in figure 11A.” However, the dots of Taniguchi have a length (long side) of 20 to 100 micrometers, and a value from 1 through 5 for long side divided by short side [paragraphs 0015 and 0062], which is smaller than the dimensions now claimed. Further, Taniguchi explicitly teaches away from a larger dot size. Taniguchi states: “When the length ( $L_6$ ,  $L_7$ ) is made more than 100 micrometers, the dot size becomes a problem” [paragraphs 0062]. Thus, Taniguchi does not disclose or suggest the above recited feature. Further, this feature is absent from other cited references.

Second, the references do not disclose or suggest that the light adjustment patterns having the dimensions described above are “formed by attaching light reflection ink,” as recited in claim 1. The dot to which Taniguchi refers is not “formed by attaching light reflection ink,” as recited in claim 1, and there is no motivation to make such a modification. The dots of Taniguchi are *small protrusions or depressions* [paragraph 0014], and therefore of an entirely different nature than the ink-based dots of Yu, which the Examiner relies on in connection with this feature. The proposed motivation of using an elliptical shape to improve the dot reflectivity rate [as described by Taniguchi in paragraph 0062] applies specifically to the protrusions and depressions of Taniguchi, and has no apparent application to the ink-based dots of Yu. Thus, the reliance on Taniguchi for the shape and/or dimensions of the dot is improper, if the Examiner is also to rely on Yu.

Second, the references do not disclose or suggest that the light adjustment patterns having the dimensions described above comprise “*a light reflection ink material comprising a light shielding agent and a diffusion agent*,” as recited in claim 1. While the Examiner relies on Kashmina in connection with this feature, it does not make sense in this case to combine the teachings of Kashmina and Taniguchi. In particular, Kashmina is directed to a light reflection, while Taniguchi is directed to transmissive protrusions or depressions. It would not be sensible to apply the high diffusion reflectance pigment of Kashmina to the protrusions or depressions of Taniguchi, as light transmission would be thwarted. Further, applying the shape or dimensions of the protrusions or depressions of Taniguchi to the pigment of Kashmina would be without any apparent purpose, as any benefit of the shape realized in Taniguchi is inapplicable in the context of a pigment.

In view of the foregoing, claim 1 clearly distinguishes over the cited combination of references. Accordingly, withdrawal of the rejection of claim 1 is respectfully requested.

b. Independent Claim 3

Independent claim 3 recites a transmission type liquid crystal display apparatus comprising: a transmission type liquid crystal panel; a light source unit in which plural light source blocks, where a large number of light emitting diodes are mounted, are arranged with a predetermined spacing therebetween, the light source unit being adapted for delivering, from a rear face side of the

liquid crystal panel, rays of display light which have been emitted from respective light emitting diodes; an optical functional sheet laminated body in which plural functional optical sheets are laminated, and adapted for suitably converting the rays of display light to guide the rays of display light thus obtained to the transmission type liquid crystal panel; a diffusion light guide plate for diffusing, therewithin, the rays of display light which have been incident from one surface side to deliver the rays of display light thus diffused from the other surface side to the optical functional sheet laminated body; a light diffusion plate oppositely disposed with a predetermined spacing with respect to the diffusion light guide plate, and adapted for allowing a portion of the rays of display light to be transmitted therethrough and to allow an other portion thereof to be reflected thereon to deliver the rays of display light thus obtained to the diffusion light guide plate in a uniform state from an entire surface thereof; and a reflection sheet oppositely disposed with a predetermined spacing with respect to the light diffusion plate at a rear face side of the light source unit, and adapted for allowing the rays of display light which have been emitted in an outer circumferential direction from the respective light emitting diodes and the rays of display light which have been reflected on the light diffusion plate to be reflected toward the light diffusion plate side; wherein the light diffusion plate is formed by resin material having light transmission characteristics, and is adapted so that light adjustment patterns are formed within respective regions facing the respective light emitting diodes of plane surfaces opposite to the light source blocks to reflect the rays of display light, the light adjustment patterns being formed by attaching light reflection ink, *wherein the light reflection ink comprises a light reflection ink material comprising a light shielding agent and a diffusion agent*, and wherein respective light adjustment patterns are formed to correspond to the respective light emitting diodes, each of the respective light emitting diodes having a diameter  $D$ , and *wherein a first length  $W_1$  corresponding to the major axis of each of the respective light adjustment patterns is 1 mm to 2 mm larger than  $D$ , and wherein a second length  $W_2$  of each of the respective light adjustment patterns, the second length  $W_2$  corresponding to a second axis perpendicular to the first axis, is 2 mm to 4 mm larger than  $W_1$ .*

For reasons similar to those discussed in connection with claim 1, claim 3 clearly distinguishes over the cited combination of references. Accordingly, withdrawal of the rejection of claim 3 is respectfully requested.

c. Independent Claim 5

Independent claim 5 recites a light diffusion member having light transmission characteristics, the light diffusion member comprising: a plurality of light adjustment patterns formed by light reflection ink, *wherein the light reflection ink comprises a light reflection ink material comprising a light shielding agent and a diffusion agent, wherein respective light adjustment patterns are formed to correspond to respective light emitting diodes, each of the respective light emitting diodes having a diameter  $D$ , and wherein a first length  $W_1$  of each of the respective light adjustment patterns is 1 mm to 2 mm larger than  $D$ , and wherein a second length  $W_2$  of each of the respective light adjustment patterns, the second length  $W_2$  being perpendicular to the first length  $W_1$ , is 2 mm to 4 mm larger than  $W_1$ .*

For reasons similar to those discussed in connection with claim 1, claim 5 clearly distinguishes over the cited combination of references. Accordingly, withdrawal of the rejection of claim 5 is respectfully requested.

III. Dependent Claims

Since each of the dependent claims depends from a base claim that is believed to be in condition for allowance (as discussed above), Applicant believes that it is unnecessary at this time to argue the allowability of each of the dependent claims individually. However, Applicant does not necessarily concur that the basis for the rejection of any of the dependent claims is proper. Therefore, Applicant reserves the right to specifically address the patentability of the dependent claims in the future, if deemed necessary.

### CONCLUSION

It is respectfully believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment set forth in the Office Action does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Furthermore, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify any concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' representative at the telephone number indicated below to discuss any outstanding issues relating to the allowability of the application.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, the Director is hereby authorized to charge any deficiency or credit any overpayment in the fees filed, asserted to be filed or which should have been filed herewith to our Deposit Account No. 23/2825, referencing Docket No. S1459.70155US00.

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Respectfully submitted,

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